

Update on Flood Plain Remapping Project
Currently Underway in Salina
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In December of 2009 the Federal Emergency Management Agency (FEMA) released Preliminary DFIRM maps (Digital Flood Insurance Rate Maps) for the City of Salina that were intended to replace the city's existing FIRM maps which have been in use since 1986. There was not a new flood study done for the city of Salina. The maps were intended to be a modernized, updated version of the 1986 flood maps. The new maps are in a digital format which is intended to make them more accurate because they can be overlaid on digital aerial photos and sent and reproduced electronically. FEMA has established a 90 day community review and comment period following the public release of new maps which gives communities like Salina the right to file an appeal challenging the accuracy of the maps. Salina's original appeal deadline was March 18, 2010.

With assistance from AMEC Earth and Environmental, the City's flood plain mapping consultant, the City hosted two community information meetings at the Salina Bicentennial Center on February 11, 2010. At those meetings, representatives of AMEC and the City of Salina expressed concern about the accuracy of the new maps, particularly in two areas, Critical Drainage Area No. 2 between Crawford Street and Cloud Street east of Ohio Street and along East Wayne between Quincy Street and Ohio Street. Both AMEC and City staff believed that the areas shown as being subject to flooding was too large in these areas and that projected flood elevations were too high. At the public meetings, City staff also expressed concern about the fact that FEMA had a record of only 500 Letter of Map Change (LOMCs) issued in Salina since 1986 while the records compiled by City staff showed the number to be 1800 LOMCs. Property owners who had a LOMC affecting their property were naturally concerned about the status of their LOMC under the proposed new maps. FEMA was unable to address these concerns because their records for Salina were incomplete.

The City of Salina submitted its formal appeal to FEMA on March 16, 2010. The technical basis for the appeal was that the Notice published to put the Salina community on notice of Base Flood Elevation (BFE) changes on the new maps was deficient because it did not identify the areas within the city where BFEs had changed. AMEC, the City's engineering consultant, also alleged that the BFEs on the maps were scientifically incorrect due to errors in the flood modeling that was done by FEMA's mapping contractor. Along with the appeal, City staff submitted 152 protests received from individual property owners protesting their inclusion in the flood plain on the new maps. Some of these protests included recently done elevation surveys of individual properties. In addition to the individual protests, City staff submitted marked up flood maps identifying physical errors on the maps such as misnamed or missing streets and incorrect city limit boundaries. Finally, City staff compiled a record and database of the 1800 LOMCs issued in Salina since 1986, scanned them and furnished them to FEMA. City staff requested that FEMA perform a revalidation analysis of all 1800 LOMCs and not just the 500 they had a record of.

FEMA did not respond to the City's appeal of technical errors in the maps but did acknowledge that the public notice published in December 2009 was deficient. FEMA granted the City of Salina a new 90 day appeal period which started on October 22, 2010 with a new published notice. City staff prepared a new appeal/protest document in January 2011 with the assistance of AMEC. The new appeal/protest document included the comments and formal protests previously received from individual property owners at the public information meetings held in February 2010.

On August 4, 2011 FEMA informed the City of Salina that our Preliminary Accreditation of Levees (PAL) agreement had expired and therefore they were going to initiate a new remapping process for the city as if the flood control levee system did not provide 100 year protection. AMEC was selected to work with the Kansas Division of Water Resources to begin the preparation of a new set of Preliminary DFIRMS for Salina. This announcement means that the 2009 Preliminary DFIRMS prepared by Michael Baker Corporation will not be adopted. These maps have been pulled from the City's website and at this point in time there are no proposed "new" flood plain maps for Salina. The 1986 maps are still in effect for the foreseeable future.

Because Congress has blocked FEMA from preparing maps for communities with noncertified levees as if the levee system does not exist, FEMA is having to develop new levee mapping criteria and all remapping activity is on hold until this criteria is finalized. FEMA reports that no new mapping activity will occur in Salina in 2012.

On November 10, 2011 FEMA sent a written response to the City of Salina's comments about the 2009 Preliminary DFIRMS prepared by Michael Baker Corporation. Revised Preliminary DFIRM panels that added or corrected information on the maps and an updated list of Letters of Map Change (LOMC) were included with FEMA's response. Having this list as complete and accurate as possible is important to property owners who want to know whether the current LOMC is going to be revalidated on the new maps.

City staff has completed its review of FEMA's November 10, 2011 response and has concluded that the updated LOMC list is still incomplete and that an adjustment of flood plain boundaries occurred only on the map panel for Critical Drainage Area No. 2. The remaining flood plain areas were unchanged from the original DFIRMS. There are about 20 Letters of Map Change in the City's database that are still missing from FEMA's list and another 20 that are incorrectly located in Salina County that need to be added to the list. The review process will not be complete until City staff is satisfied that all local LOMCs are accounted for.

FEMA has also set up a new mediation process that involves the use of a "Scientific Resolution Panel" to review conflicting technical data submitted by communities. Because FEMA's response did not address technical errors on the maps that the City challenged in its Appeal and Protest, City staff is recommending that the City of Salina take advantage of this review panel to make its case as to why the 2009 Preliminary DFIRMS should not be reissued or used in any form. The City's goal continues to be to have the most accurate flood plain maps possible under this nationwide remapping program.